

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

No. 17-20274

Plaintiff,

Hon. Bernard A. Friedman

v.

D-1 JUMANA NAGARWALA,
D-2 FAKHRUDDIN ATTAR,
D-3 FARIDA ATTAR,
D-6 FATEMA DAHODWALA,

Defendants.

_____/

**GOVERNMENT’S RESPONSE TO
DEFENDANTS’ MOTION FOR DISCOVERY (ECF 473)**

Defendants have filed a motion asking the Court to order that the government produce discovery obtained through the Foreign Intelligence Surveillance Act (FISA). In their motion, defendants state that “it is evident that the government engaged in monitoring that has not been disclosed, and the evidence indicates that this monitoring occurred through the Foreign Intelligence Surveillance Act.” ECF No. 473, PageID 3372. Without support, Defendants further argue that “the government had to have been using other surveillance mechanisms, and this other

surveillance mechanism appears to be monitoring that occurred under [FISA].” ECF No. 473, PageID 3376-77.

The prosecution team has no FISA material. FISA material was not used at any point during the investigation. Before filing this motion, defendants did not ask the government whether the prosecution team possessed any FISA material. Had defendants asked, the government would have responded that the prosecution team has never used, possessed, or obtained any FISA material. Defendants have no reason to believe that the government used FISA material in this investigation or prosecution. The motion is baseless and should be denied.

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s/ Sara D. Woodward
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Dated: October 30, 2020

CERTIFICATE OF SERVICE

I certify that on October 30, 2020, I electronically filed this motion response for the United States with the Clerk of the United States District Court for the Eastern District of Michigan using the ECF system, which will send notification of such filing to counsel of record.

/s/ Sara Woodward
AUSA, Eastern District of
Michigan